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8 Attorneys for the Plaintiff

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 OAKLAND BRANCH

12 UNITED STATES OF AMERICA, )

13 Plaintiff, )

14 v. )

15 )  
16 JOEL SANCHEZ,  
ALFREDO SANCHEZ, and  
17 HECTOR REYNOSO,

18 Defendants. )  
19 )

No. CR-07-00409-SBA

STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE STATUS  
FROM JULY 22, 2008 TO SEPTEMBER  
9, 2008 AND EXCLUDING TIME

20 It is hereby stipulated, by and between the parties, that the status hearing currently  
21 set for July 22, 2008 be continued to September 9, 2008 at 9:00 a.m.

22 It is also stipulated that the period from July 22, 2008 to September 9, 2008, shall  
23 be excluded from the calculation of time in which the trial of the above captioned matter  
24 must commence pursuant to the Speedy Trial Act, Title 18 U.S.C. Section 3161(c). The  
25 parties stipulate that the time is excludable from the time limitations of the Speedy Trial  
26 Act because the interests of justice served by granting a continuance.

1 Such continuance is required because the government has received an additional  
2 discovery request from counsel for defendant Hector Reynoso. This continuance will  
3 allow the reasonable time necessary for effective preparation, taking into account the  
4 exercise of due diligence.

5 As such, the parties respectfully request that the status hearing scheduled for July  
6 22, 2008 be continued to September 9, 2008 at 9:00 a.m.

7 DATED: July 21, 2008

Respectfully submitted,

8 /s/

9 KIMBERLY M. BRIGGS  
Assistant United States Attorney

10 DATED: July 21, 2008

/s/

11 EDWARD G. DUREE  
Attorney for Joel Sanchez

12 DATED: July 21, 2008

/s/

13 ROBERT L. FORKNER  
Attorney for Alfredo Sanchez

14 DATED: July 21, 2008

/s/

15 IVAN MORSE  
Attorney for Hector Reynoso

16  
17 Based on the reason provided in the stipulation of the parties above, the Court  
18 hereby FINDS that for adequate preparation of the case by all parties - specifically, to  
19 allow the government to provide additional discovery to counsel for defendant Hector  
20 Reynoso - pursuant to 18 U.S.C. Sections 3161(h)(8)(A) and (B)(iv) an exclusion of time  
21 is warranted under the Speedy Trial Act. Based on these findings, IT IS HEREBY  
22 ORDERED THAT the status hearing currently scheduled for July 22, 2008 at 9:00 a.m.  
23 shall be continued to September 9, 2008 at 9:00 a.m.

24 **IT IS SO ORDERED.**

25 DATED:

26 SAUNDRA BROWN ARMSTRONG  
United States District Judge